

as Claims Administrator for the Settlement of the above-captioned action by this Court's Preliminary Approval Order Providing for Notice and Hearing in Connection with Proposed Class Action Settlement dated October 7, 2010.

2. I submit this supplemental affidavit to provide the Court with updated information regarding the mailing of additional copies of the Notice of Pendency and Proposed Settlement of Class Action ("Notice") and Proof of Claim form ("Claim Form" and, together with the Notice, the "Notice Packet") and to report on the requests for exclusion received. I have personal knowledge of the facts attested to herein.

UPDATE ON MAILING OF NOTICE PACKETS

3. As set forth in detail in my affidavit dated November 19, 2010 ("La Count Mailing Affidavit"), that was filed with the Court on November 22, 2010, A.B. Data had mailed or caused to be mailed a total 52,217 Notice Packets individually or in bulk to individuals, nominees and institutions, as of November 18, 2010.

4. As of December 9, 2010, A.B. Data has mailed or caused to be mailed an additional 1,357 copies of the Notice Packet, individually or in bulk, to individuals, nominees and institutions.

5. In the aggregate, A.B. Data has mailed or caused to be mailed a total of 53,574 copies of the Notice Packet as of December 9, 2010.

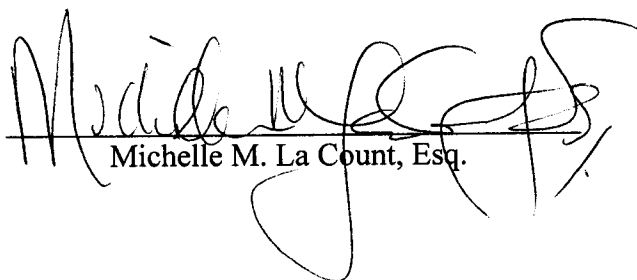
6. As a result of these mailings, A.B. Data received returned mail from the United States Postal Service ("USPS"). As of December 8, 2010, a total of 4,073 Notice Packets were returned by the USPS to A.B. Data as undeliverable as addressed; of those returned, A.B. Data was able to obtain forwarding addressing for 291 and these Notice Packets were re-mailed to the new address.

REPORT ON EXCLUSION REQUESTS RECEIVED

7. The Notice informed potential Class Members that any written requests for exclusion were to be mailed addressed to SafeNet Securities Litigation, Claims Administrator, EXCLUSIONS, c/o A.B. Data, Ltd., PO Box 170500, Milwaukee, WI 53217-8042, such that they were received no later than November 29, 2010. *See* Notice at ¶13. A.B. Data has been monitoring all mail delivered to that post office box. As of December 9, 2010, no requests for exclusion have been received from potential Class Members. I also note that, although the Notice directed that any objections (as opposed to requests for exclusion) be mailed to the Clerk of the Court and to counsel for Lead Plaintiffs and defendant SafeNet (*see* Notice at ¶18), we have also not received copies of any objections to the Settlement or to the requested awards of attorneys' fees or expenses.


I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 9, 2010


Michelle M. La Count, Esq.

Sworn to before me this

9th day of December, 2010


Notary Public
expires 5/4/14

